

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA

6:23-cr-00060-MC

v.

INFORMATION

KRISTIN COLLINS

26 U.S.C. § 7206(1)

Defendant.

THE UNITED STATES ATTORNEY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. Defendant **KRISTIN COLLINS** lived in or around Bend, Oregon.
2. Defendant **COLLINS** owner and operated Elite Sports Performance International, Sport Tech Systems International, and Sport Technology Specialists International (hereinafter collectively referred to as STSI). STSI provided guidance, service, and support in sports technology to various customers worldwide.
3. Defendant **COLLINS** and STSI contracted with the Netherlands Olympic Committee for tax years 2011 through 2016, the Brazilian Olympic Committee for tax years 2015, 2016 and 2017, and the Chinese Winter Sports Center for tax years 2018, 2019 and 2020.

Defendant **COLLINS** also contracted with two entities headquartered in the United States for tax years 2016, 2017 and 2018.

4. Beginning in at least tax year 2015 and continuing through at least tax year 2020, Defendant **COLLINS** subscribed to materially false tax returns by underreporting her income and inflating her expenses. Defendant **COLLINS** reported only the income earned within the United States for tax years 2015 through 2018 and submitted doctored invoices and false expense items to her return preparer for tax years 2016 through 2020.

COUNT 1
(False Income Tax Returns)
(26 U.S.C. § 7206(1))

5. Paragraphs 1 through 4 are incorporated herein by reference.

6. On or October 11, 2016, in the District of Oregon and elsewhere, defendant **KRISTIN COLLINS** did willfully make and subscribe U.S. Individual Income Tax Return Form 1040 for calendar year 2015, which was verified by a written declaration that it was made under penalties of perjury. Defendant **COLLINS** did not believe the return, which she filed with the Internal Revenue Service, to be true and correct as to every material matter, in that the return omitted foreign income, income **COLLINS** knew she earned and must report, All in violation of Title 26, United States Code, Section 7206(1).

Dated: February 28, 2023

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Gavin W. Bruce
GAVIN W. BRUCE, OSB #113384
Assistant United States Attorney